

EXHIBIT H

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION

JASON MATTHEW LYNCH,	)	Case No. 4:24-cv-00740-LPR-BBM
Plaintiff,	)	
v.	)	
WHITE COUNTY, ARKANSAS, et al.,	)	
Defendants.	)	

DECLARATION OF JASON MATTHEW LYNCH AUTHENTICATING
PHOTOGRAPHIC EXHIBITS AND DESCRIBING THE WITHHOLDING OF
FEDERAL COURT FORMS

I, Jason Matthew Lynch, declare as follows:

1. I am the Plaintiff in this action. I make this Declaration from my own personal knowledge and could testify competently to the matters stated below.
2. I was incarcerated at the White County Detention Center in White County, Arkansas, from approximately June 9, 2024, through September 9, 2024.
3. While incarcerated, I was attempting to prepare and pursue federal civil-rights claims concerning the treatment I received at the White County Detention Center, including claims arising from the denial, interruption, crushing, dissolving, and improper administration of my prescribed HIV medication and the failure to provide constitutionally adequate medical care.
4. During my incarceration, I requested official federal prisoner civil-rights complaint forms and applications to proceed in forma pauperis from White County Detention Center personnel on more than thirty occasions.
5. Despite my repeated requests, I was not provided the official forms I needed.
6. Because I could not obtain the forms from detention-center personnel, I arranged for another person outside the detention center to obtain official United States District Court

prisoner civil-rights forms and in forma pauperis forms and mail them directly to me at the White County Detention Center.

7. The materials sent to me included official federal court instructions, prisoner civil-rights complaint forms for claims brought under 42 U.S.C. § 1983, and forms for requesting permission to proceed in forma pauperis.
8. The materials were sent to me in a United States Postal Service Priority Mail package. The package was addressed to me and was plainly marked "LEGAL MAIL."
9. I was not called to receive or open this package while I was incarcerated at the White County Detention Center.
10. The package and its contents were not delivered to me during my confinement.
11. I did not authorize any White County employee or any other person to open the package outside my presence, withhold the package from me, or place it into my stored property without giving me access to its contents.
12. When the package was eventually recovered from my stored personal property, it had already been opened.
13. The package contained the federal court forms that had been mailed to me.
14. The package or materials associated with it displayed the words "DO NOT GIVE TO INMATE."
15. I did not write, direct anyone to write, or authorize anyone to place the words "DO NOT GIVE TO INMATE" on the package or its contents.
16. The photographs submitted with the accompanying Motion were taken after the package was recovered from my stored property.
17. I personally examined the package, its exterior markings, and its contents after the package was recovered.
18. The photographs attached as Exhibits A, B, F, and G fairly and accurately depict the package, its markings, its opened condition, and its contents as I personally observed them after recovering the package.

19. Exhibit A fairly and accurately depicts the exterior of the USPS Priority Mail package addressed to me and marked "LEGAL MAIL."
20. Exhibit B fairly and accurately depicts the condition of the package after it was recovered from my stored personal property.
21. Exhibit C fairly and accurately depicts the official federal court instructions for filing a prisoner civil-rights action that were contained within the package.
22. Exhibit D fairly and accurately depicts the official prisoner civil-rights complaint forms contained within the package.
23. Exhibit E fairly and accurately depicts the official application to proceed in forma pauperis contained within the package.
24. Exhibit F fairly and accurately depicts the words "DO NOT GIVE TO INMATE" appearing on materials associated with the package.
25. Exhibit G fairly and accurately depicts the contents of the package as recovered.
26. The photographs accurately represent the appearance and condition of the package and its contents when I examined them.
27. The photographs have not been altered in a manner that changes the appearance, substance, or meaning of what they depict.
28. To the extent any photograph has been cropped, enlarged, or redacted for filing, those changes were made only to improve readability or protect personal identifying information and did not change the substantive contents of the photograph.
29. I recognize the package as the package sent to me because it was addressed to me, contained the federal court materials I had arranged to have mailed, bore legal-mail markings, and was recovered from the personal property maintained for me during my incarceration.
30. The package was not merely personal correspondence. It contained official court forms that I needed to prepare and pursue federal civil-rights claims concerning ongoing medical treatment and other conditions at the White County Detention Center.

31. At the time the forms were mailed, I was seeking a means to present claims concerning the interruption and alteration of essential HIV medication and the failure to provide adequate medical care.
32. Because I was not given the package or its contents while incarcerated, I was unable to use those particular forms when the alleged medical violations were occurring.
33. The withholding of the forms hindered my ability to prepare a complete and organized federal complaint, request timely judicial review of my ongoing medical treatment, request preservation of relevant evidence, and identify the correctional and medical personnel involved.
34. My underlying medical claims were concrete and serious. They concerned the administration of prescribed HIV medication and other medical treatment, rather than an abstract or hypothetical legal issue.
35. Medical issues arising during and following the events described in my lawsuit remain under medical evaluation and treatment.
36. I offer the photographs to establish what the package and its contents looked like when recovered and to corroborate my account that the court forms mailed to me were not delivered during my incarceration.
37. I understand that the photographs alone may not establish the identity of every person who handled the package or the reasons for each person's actions.
38. I submit this Declaration to authenticate the photographic exhibits and to provide the Court with my firsthand account of the package, its contents, its condition when recovered, and the circumstances under which I was denied access to those materials.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this _____ day of _____, 2026, in
_____, Arkansas.

Jason Matthew Lynch

Plaintiff, Pro Se

Mailing Address: _____

Telephone: _____

Email: _____

Optional certificate identifying Exhibit H

Place this page immediately before the declaration:

EXHIBIT H

Plaintiff's Declaration Under 28 U.S.C. § 1746 Authenticating the Photographic Exhibits and
Describing the Withholding of Official Federal Court Forms